

Remarks/Arguments

In the Final Office Action mailed on 24 October 2007, the Examiner rejected claims 1-2, 4-7, 9-12 and 14-15 under 35 U.S.C. §103(a) as unpatentable over Hower Jr. et al. (U.S. Patent No. 5,467,434) in view of Mori et al. (U.S. Patent No. 6,433,882), rejected claims 3, 8 and 13 under 35 U.S.C. §103(a) as unpatentable over Hower in view of Mori in further view of Tominaga (U.S. Patent Publication No. 2002/0015180), and rejected claims 16-20 under 35 U.S.C. §103(a) as unpatentable over Hower in view of Mori and further in view of Schwarz (U.S. Patent No. 6,476,927).

Applicants respectfully traverse the rejections and request reconsideration and withdrawal thereof.

35 U.S.C. §103(a) Rejections of All Claims

The Examiner rejected all claims (1-20) as unpatentable over Hower in view of Mori, or over Hower and Mori in view of other references. In particular, independent claims 1, 6, and 11 were rejected over Hower in view of Mori. The Examiner presents his rejection principally with respect to claim 6 and thus Applicants' response will be presented principally with reference to claim 6.

The Examiner's rejection of claim 6 is, in essence, identical to the §103 rejections stated in the prior office action. In the Examiner's "Response to Arguments" relating to the Applicants' prior response. The Examiner seeks to clarify that the prior Examiner (in the prior Office Action) was relying on Mori *only* for the teaching that device independent options may be specified (and presumably converted to device specific commands though the Examiner does not state so). Applicants readily acknowledge it is known in the art that a device option or instruction may be specified in a device independent form and converted to a device specific form. Such is precisely the function of a printer device driver as has been known for as long as computer's coupled to printers. Or, in a more recent context, an AFP or PDF document is stored in a device independent form. When a specific printer is selected to present the document, an application program converts the device independent document (print job) into device specific instructions. Mori does indeed teach a particular driver structure that first translates device options/instructions generated by an application into an intermediate format (an Enhanced Meta File - EMF). In other words, the print job in Mori as generated by an application is first translated from API function

invocations into an EMF and then further converted from EMF format to a device specific set of instructions for a particular printer. The EMF *is* the print job - it is not a job ticket. ***Nothing in Mori teaches or remotely suggests that device independent options, separate and distinct from the print job, are stored in a job ticket, separate and distinct from the print job, and then converted into one or more printer specific commands.*** The Examiner therefore seeks to clarify that Hower teaches all other recited elements of the rejected claims but for the conversion of printer options from device independent form into printer specific form. Applicants respectfully disagree.

Next in his "Response to Arguments" the Examiner takes issue with the Applicants' previous remarks regarding Mori that: "the printer options for a print job are not stored in a job ticket associated with the print source file, but are stored in the print source file itself." However, in stating his reasons for disagreeing with this quoted assertion by Applicants about Mori, the Examiner cites Hower at column 3, line 50 through column 4, line 10. First, Applicants respectfully submit that if the Examiner disagrees with the Applicants' assertions regarding Mori he should discuss Mori and not Hower. However, looking past that error, the cited portions of Hower also teach nothing of storing desired job options in a job ticket in a device independent form and then converting the device independent options into printer specific commands that are sent to the selected printer. Rather, the cited passage of Hower merely states that clients provide electronic documents that are the source of print jobs and that a user interface on client systems generates "programming selections" defined within a job ticket.

The job ticket in Hower is used in the client that generates it by a "combination examiner" to determine if the selected options are possible given the collection of printer profiles - in other words, determining whether the program selections of the job ticket match the profile capabilities of any printer. Hower's client merely uses the job ticket as a repository for storing and validating program selections to instruct the server how to print the job. See, e.g., column 3, line 67 through column 4, line 12. Thus Hower's use of the job ticket within the client does not teach or suggest ever converting the job ticket program selections into printer specific commands.

Hower mentions that the job ticket is transmitted to the server 25 but not for any purposes of conversion from device independent form into printer specific instructions. Rather, the job ticket is transmitted to the server in Hower to use as a representative of the associated print job to

be printed. The job ticket is used in the server's print queues to represent the job to be printed. The job ticket is moved to an appropriate print queue corresponding to a selected printer. See, e.g., column 6, lines 44-47 and column 7, lines 30-32. Nothing in Hower teaches or suggests use of the information in the job ticket (specified in a device independent format) within the server to convert the options to printer specific instructions sent to the printer.

Thus, while both Hower and Mori (and admitted prior art) teach the broad concept that job options may be specified in a device independent format, nothing in Hower or Mori teaches or suggests that the job options are stored in a job ticket in device independent format and ***converted to printer specific commands sent to the printer***. Further, none of the art of record, considered individually or in any combination, teaches this feature.

Thus Applicants maintain that claim 6 is allowable over all art of record and respectfully request withdrawal of the rejection. Independent claims 1 and 11 were rejected for essentially similar reasons and include similar recitations as regards conversion of job ticket information. Thus Applicants maintain that independent claims 1 and 11 are allowable over all art of record for at least the same reasons as claim 6. Further, dependent claims 2-5, 7-10, and 12-20 recite additional limitations and thus are allowable for at least the same reasons and as dependent from allowable base claims. Applicants therefore respectfully request reconsideration and withdrawal of the rejection of all claims (1-20).

Conclusion

Applicants maintain that all claims (1-20) are inventively distinguishable from all prior art of record (considered individually or in any combination) for at least the above discussed reasons. Applicants therefore respectfully request reconsideration and withdrawal of the rejections under 35 U.S.C. §103(a).

Respectfully submitted,

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/Daniel N. Fishman/

Daniel N. Fishman (Reg. No 35,512)
Duft, Bornsen & Fishman, LLP
1526 Spruce Street, Suite 302
Boulder, CO 80302
(303) 786-7687
(303) 786-7691 (fax)